

ENVIRONMENTAL SERVICES DEPARTMENT AIR QUALITY DIVISION

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Technical Guidance #TG98-005 Rule: 315, subsection 301.1

September 2, 1998 Subject: Requirements for spraying

in outdoor roofed enclosures.

Issue: Subsection 301.1 requires that spray be directed in a horizontal or downward pointing manner so that overspray is directed at the walls or floor of the enclosure. The subsection also prohibits spraying from within three feet of any open end and/or within two feet of the top of the enclosure. As the rule is currently constructed, the requirement applies not only to three-sided enclosures but to enclosures with three sides and a roof or complete enclosures as well.

Discussion: A small number of outside enclosures have three sides and a roof or are completely enclosed. For these types of enclosures the requirements in 301.1 are unnecessarily restrictive, since the more complete enclosures provide additional containment for the overspray.

Conclusion:

- (1) For enclosures with three sides and a roof or complete enclosures, spray shall be directed **into** the enclosure so that the overspray is directed **away from any opening in** the enclosure. No spraying shall be conducted within three feet of any open end and/or within two feet of any **open** top of the enclosure.
- **(2)** Rule 315 should be revised to include provisions for the more complete outside enclosures described above.